

**ENTERED**

June 21, 2024

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

DIAMOND SPORTS GROUP, LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 23-90116 (CML)  
)  
) (Jointly Administered)  
)**AMENDMENT TO STIPULATED PROTECTIVE ORDER**

[Related to Dkt. No. 822]

This Amendment to Stipulated Protective Order (this “Amended Order”) is entered into by and among: (a) the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”); (b) the Official Committee of Unsecured Creditors of Diamond Sports Group, LLC, *et al.*; and (c) Cleveland Guardians Baseball Company, LLC (the “Guardians”) and Rangers Baseball LLC (the “Rangers”); (d) the Office of the Commissioner of Baseball d/b/a Major League Baseball (“MLB”), on behalf of itself, its affiliates, and each MLB club that is a party to a telecast rights agreement with the Debtors or their non-debtor affiliates (together with the Guardians and the Rangers, the “MLB Clubs”); (e) the National Basketball Association (“NBA”), on behalf of itself, its affiliates, and each NBA team that is a party to a telecast rights agreement with the Debtors or their non-debtor affiliates (the “NBA Teams”); (f) the National Hockey League (“NHL”), on behalf of itself, its affiliates, and each NHL club that is a party to a telecast rights agreement with the Debtors or their non-debtor affiliates (the “NHL Clubs”); (g) the Ad Hoc Crossholder Group; (h) the Ad Hoc First Lien Group; (i) Amazon.com

<sup>1</sup> A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors’ service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

Services LLC (“Amazon”); and (j) any other persons or entities who are seeking Discovery Material, or from whom Discovery Material is sought in these cases and who becomes bound by this Order. Each of the persons or entities identified in the foregoing clauses (a) through (j) shall be referred to herein individually as a “Party” and collectively as the “Parties.”<sup>2</sup> The Parties, by and through their respective attorneys of record, and subject to approval by the Court, have agreed to entry of this Amended Order, which amends the *Stipulated Protective Order* entered by the Court on June 2, 2023 [Docket No. 822] (the “Protective Order”), pursuant to 11 U.S.C. § 107(b) and Bankruptcy Rule 9018, and, as applicable, pursuant to Bankruptcy Rules 7026 and 9014 and Federal Rule 26(c).<sup>3</sup>

### **Recitals**

WHEREAS, certain of the Parties entered into the Protective Order, which was entered by the Court on June 2, 2023;

WHEREAS, the NBA, on behalf of itself, its affiliates, and the NBA Teams, desires to become a party to the Protective Order and subject to all of its terms;

WHEREAS, the NHL, on behalf of itself, its affiliates, and the NHL Clubs, desires to become a party to the Protective Order and subject to all of its terms;

WHEREAS, certain MLB Clubs that were not parties to the Protective Order desire to become parties to the Protective Order and subject to all of its terms; and

WHEREAS, Amazon desires to become a party to the Protective Order and subject to all of its terms.

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<sup>2</sup> The designation of a “Party” is for purposes of reference in this Amended Order only. In addition to the Parties, the Ad Hoc Secured Group was a signatory to the Protective Order. The Ad Hoc Secured Group did not produce any Discovery Material under the Protective Order and is no longer involved in the Chapter 11 Cases. Accordingly, the Ad Hoc Secured Group is not a Party to this Amended Order, it will not receive any Discovery Material from and after the date of this Amended Order, and its rights are not impacted by this Amended Order.

<sup>3</sup> Capitalized terms used but not defined herein shall have the meanings given to them in the Protective Order.

NOW, THEREFORE, to facilitate and expedite the production, exchange, and treatment of Discovery Material, and to facilitate the prompt resolution of disputes over confidentiality, and to protect Discovery Material that a Party seeks to maintain as Confidential Material, Attorneys' Eyes Only Material, or Outside Counsel Only Material (as those terms are defined in the Protective Order), it is hereby stipulated and agreed, and, upon Court approval, it is hereby ORDERED:

1. The NBA, its affiliates, and the NBA Teams are deemed "Parties" to the Protective Order and subject to its terms, and, for the avoidance of doubt, are deemed to be included in the list of parties that are entitled to receive information pursuant to paragraphs 10 through 12 of the Protective Order.

2. The NHL, its affiliates, and the NHL Clubs are deemed "Parties" to the Protective Order and subject to its terms, and, for the avoidance of doubt, are deemed to be included in the list of parties that are entitled to receive information pursuant to paragraphs 10 through 12 of the Protective Order.

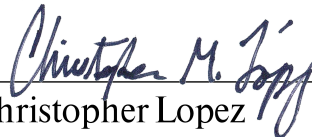
3. The MLB Clubs are deemed "Parties" to the Protective Order and subject to its terms, and, for the avoidance of doubt, are deemed to be included in the list of parties that are entitled to receive information pursuant to paragraphs 10 through 12 of the Protective Order.

4. Amazon is deemed a "Party" to the Protective Order and subject to its terms, and, for the avoidance of doubt, are deemed to be included in the list of parties that are entitled to receive information pursuant to paragraphs 10 through 12 of the Protective Order.

5. Except as otherwise expressly modified by this Amended Order, all terms and provisions of the Protective Order remain in full force and effect.

**THE FOREGOING STIPULATION IS SO ORDERED:**

Signed: June 21, 2024

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

**IT IS SO STIPULATED:**

Dated: June 20, 2024

*/s/ John F. Higgins*

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